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Fort Worth, TX 76102

Long B. Nguyen  
Environmental, Health & Safety Manager

May 20, 2021

Director, Air Enforcement Division  
U.S. Environmental Protection Agency  
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1200 Pennsylvania Ave. NW  
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Director of Litigation  
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Austin, TX 78711

Cheryl Seager  
Director  
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U.S. Environmental Protection Agency,  
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Division Chief  
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Office of the Attorney General of Texas  
P.O. Box 12548  
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Austin, TX 78711

Chief, Environmental Enforcement  
Section Environment and Natural  
Resources Division  
U.S. Department of Justice  
Box 7611 Ben Franklin Station  
Washington, D.C. 20044

**Re: Malfunction Event Notice  
Tokai Carbon CB Big Spring Plant**

Dear Sir/Madame:

Per Provision 54 of the Consent Decree, Tokai Carbon CB hereby provides notice that the Big Spring Plant experienced a malfunction at the Incinerator on April 29, 2021. This malfunction resulted in the use of the flares as backup control devices and for safety measure.

The flares had to be used when the Incinerator experienced this malfunction. The malfunction was caused by the vent valve opened unexpectedly due to excess pressure on the Incinerator tailgas header. This excess pressure was caused by the sudden, unavoidable breakdown of the electrical coil that controls the opening and closing of the B-Block valve. When this coil fails, it fails with the B-Block valve in the closed position. The electrical coil is not a normal routine maintenance item. There is no manufacturer recommended

maintenance or periodic replacement of the coil. Going forward, plant personnel will perform testing on the electrical coil during the annual Incinerator maintenance event.

As soon as plant personnel became aware of this malfunction, which caused the Incinerator to trip, they began to troubleshoot the cause of the malfunction immediately. Flares 1 and 2 were operated for about five hours and Flare 3 was operated for about eight hours as the result of this Incinerator malfunction.

In addition to this notice, Tokai Carbon CB will assert an affirmation defense this malfunction event in the next semi-annual compliance report per Provision 77 of the Consent Decree. Please let me know if you need additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Long B. Nguyen', with a stylized flourish at the end.

Long B. Nguyen